

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

MOHAMMED ABDUL RASHEED QURAISHI,  
MOHAMMED ABDUL QAYIUM QURAISHI,  
MOHAMMED ABDUL AZIZ QURAISHI

Cr. No. 04-10345-NMG

**MOTION OF MOHAMMED ABDUL AZIZ QURAISHI  
AND MOHAMMED ABDUL QAYIUM QURAISHI TO  
EXTEND MASSACHUSETTS VISIT**

Pursuant to this Court's Order dated January 7, 2008 (Docket No. 155), which provides that defendants, Mohammed Abdul Aziz Quraishi ("Aziz") and Mohammed Abdul Qayium Quraishi ("Farees") (collectively the "Brothers"), shall "file any motion to extend the term of their escorted release" by 4:00 p.m. today, the Brothers respectfully request that this Court permit them to extend their release until two days following the death of their mother, who is gravely ill and in the final days of her life. In addition, the Brothers respectfully request that they be permitted to visit with their mother for a minimum of 6 hours per day on each additional day of their visit.

In support of their Motion, the Brothers state as follows:

1. The Brothers' mother, Mrs. Razia Sultana ("Mrs. Sultana") is currently a patient at Cedar Hill Health Care Center in Randolph, Massachusetts, where she was moved on January 7, 2008.

2. According to her treating physician, Dr. Richard T. Penson MD of Massachusetts General Hospital, she “is expected to live only a few more days with terminal cancer,” and “is now doing poorly, and likely in the last few days of her life.” *See Exhibit A*, Letter dated January 8, 2008 from Dr. Richard Penson to Laura Angelini, Esq.

3. Given that Mrs. Sultana is “in the last few days of her life,” the Brothers request that they be permitted to stay in Massachusetts to be with their mother until she passes, and for two days thereafter in order to administer her last rites.

4. Counsel for defendants have been informed that the last rites are typically administered by a deceased son(s), at a local mosque within days of the death. *See Declaration of Jill Brenner Meixel*, attached hereto as Exhibit B.

5. Counsel for defendants have also been informed that in the Brothers’ religion, the son(s) are the only individuals permitted to touch the body of the deceased. *Id.*

6. For all of the above-stated reasons, the Brothers respectfully request that this Court order (1) that the Brothers’ trip to Massachusetts be extended until two days following their mother’s death, so that they can be with her until she dies, and thereafter administer her last rites and other rituals customary in their family’s religion; and (2) that they be permitted to spend a minimum of 6 hours per day with their mother on each additional day that visitation is permitted.

The Government does not assent to the requested extension of time for the Brothers’ escorted release.

Respectfully submitted,

COUNSEL FOR AZIZ QURAISHI,

/s/ Laura B. Angelini  
Michael J. Connolly (BBO # 638811)  
Laura B. Angelini (BBO #658647)  
Hinckley, Allen & Snyder LLP  
28 State Street  
Boston, MA 02109  
(617) 345-9000

COUNSEL FOR FAREES QURAISHI,

/s/ Jill Brenner Meixel  
Peter E. Gelhaar (BBO #188310)  
Jill Brenner Meixel (BBO #652501)  
Donnelly, Conroy & Gelhaar, LLP  
One Beacon Street  
Boston, MA 02108  
(617) 720-2880

Dated: January 8, 2008

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that I conferred in good faith with counsel for the government in an effort to narrow or resolve the issues raised in this Motion.

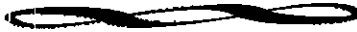
/s/ Jill Brenner Meixel  
Jill Brenner Meixel

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of January 2008, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Jill Brenner Meixel  
Jill Brenner Meixel

# **EXHIBIT A**

MASSACHUSETTS GENERAL HOSPITAL  
CANCER CENTER™MASSACHUSETTS  
GENERAL HOSPITALRichard Penson, MRCP, MD  
*Clinical Director Medical Gynecologic Oncology*Gillette Center for Gynecologic Oncology  
55 Fruit Street, Yawkey Center, Suite 9E  
Boston, Massachusetts 02114Email: [rpenson@partners.org](mailto:rpenson@partners.org)  
Tel: 617.724.4800, Fax: 617.724.6898

January 8, 2008

Attn: Laura

**Fax: 617-345-9020**

To Whom It May Concern:

Re:  
ABDUL AZIZ QURAISHI # 80471038  
ABDUL QAYUM QURAISHI # 80470038  
ABDUL RASHEED QURAISHI [# N/A]

Mrs. Razia Sultana is a delightful 69yo Indian woman with Stage IV serous endometrial carcinoma currently in a nursing home and is expected to live only a few more days with terminal cancer.

She originally presented with incurable cancer in September 2006. She completed six cycles of chemotherapy, and had surgery on April 20, 2007. The final pathology revealed a poor prognosis (serous carcinoma) tumor. Sadly, in June 2007 she developed a bowel obstruction which requiring surgery, and has since done poorly on palliative Doxil chemotherapy, was admitted to MGH with failing health, and transferred to hospice care at the end of 2007.

She is now doing poorly, and likely in the last few days of her life.

We are writing to petition you to facilitate the extension of a compassionate visit from her family.

Yours sincerely,

Richard T. Penson MD MRCP

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

MOHAMMED ABDUL RASHEED QURAISHI,  
MOHAMMED ABDUL QAYIUM QURAISHI,  
MOHAMMED ABDUL AZIZ QURAISHI,

Defendants

Crim. No. 04-10345-NMG

**DECLARATION OF JILL BRENNER MEIXEL**

I, Jill Brenner Meixel, declare as follows:

1. I am counsel for Mohammed Abdul Qayium Quraishi ("Farees"). I submit this Declaration on behalf of Farees Quraishi and his brother, Mohammed Abdul Aziz Quraishi ("Aziz") (collectively, the "Brothers") in support of their Motion to Extend the Brothers' visit to Massachusetts to spend time with their ailing mother before her death, and for two days following her death in order to administer her last rites.

2. On January 8, 2008, I and counsel for Aziz, Laura Angelini, Esq., spoke with Aziz Quraishi's wife, who informed us of the following:

3. The last rites are traditionally administered by the deceased's son(s), within days of the death.

4. The son(s) are the only individuals permitted to touch the body of the deceased.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on this 8th day of January 2008.

/s/ Jill Brenner Meixel  
Jill Brenner Meixel

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of January 2008, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Jill Brenner Meixel  
Jill Brenner Meixel